

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

DEUTSCHE BANK TRUST COMPANY)	Civil Action No. 11-CV-00358
AMERICAS, in its capacity as successor)	
indenture trustee for certain series of)	JUDGE BECKWITH
Senior Notes, <i>et al.</i> ,)	
)	MAG. JUDGE BOWMAN
Plaintiffs,)	
v.)	
)	
AMERICAN ELECTRIC POWER, <i>et al.</i> ,)	
)	
Defendants.)	

**MOTION OF LABORERS' DISTRICT COUNCIL AND CONTRACTORS PENSION
FUND OF OHIO FOR ENTRY OF AGREED ORDER EXTENDING TIME UP TO AND
INCLUDING NOVEMBER 29, 2011 TO ANSWER OR OTHERWISE
RESPOND TO PLAINTIFFS' COMPLAINT**

Plaintiffs Deutsche Bank Trust Company Americas, in its capacity as successor indenture trustee for certain series of Senior Notes, Law Debenture Trust Company of New York, in its capacity as successor indenture trustee for certain series of Senior Notes, and Wilmington Trust Company, in its capacity as successor indenture trustee for the PHONES Notes ("Plaintiffs"), and Defendant Laborers' District Council and Contractors Pension Fund of Ohio ("Fund"), have agreed to extend the time within which Defendant Fund may answer or otherwise respond to Plaintiffs' Complaint until November 29, 2011, subject to any stay of proceedings that may otherwise be ordered by the Court. Accordingly, pursuant to Local Rule 7.3(a) and 7.4, Defendant Fund hereby moves the Court to grant the requested extension per the parties' agreement. This motion briefly exceeds the permissible stipulation of Local Rule 6.1(a), and

therefore requires approval of the Court.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on September 29, 2011, a copy of the foregoing Motion of Laborers' District Council and Contractors Pension Fund for Entry of Agreed Order Extending Time up to and including September 29, 2011 to Answer or Otherwise Respond to Plaintiffs' Complaint was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's Electronic Case Filing System. Parties may access this filing through the Court's Electronic Case Filing System.

s/Basil W. Mangano